

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF PENNSYLVANIA**

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MATTHEW LENNON,

Plaintiff,

vs.

TRANS UNION, LLC;

Defendant.

CASE NO: 2:25-cv-01431-CFK

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**TRANS UNION LLC’S UNOPPOSED MOTION FOR EXTENSION OF TIME TO  
RESPOND TO PLAINTIFF’S COMPLAINT**

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Defendant Trans Union, LLC (“TransUnion”) hereby files its unopposed Motion for Extension of Time to Respond to Plaintiff’s Complaint (“Motion”) and in support states:

1. On March 18, 2025, TransUnion removed Plaintiff’s Montgomery County Court of Common Pleas action alleging violation under the Fair Credit Reporting Act, 15 U.S.C. § 1681 *et seq.* to the Eastern District Court of Pennsylvania. ECF No.1.

2. TransUnion’s responsive pleading to Plaintiff’s Complaint is due on April 17, 2025.

3. TransUnion, with the consent of the Plaintiff, requests that its time to file a responsive pleading to Plaintiff’s Complaint be enlarge by two weeks to May 1, 2025.

4. This extension will allow TransUnion adequate time to review and address the Complaint, relevant case law and its own records, and ensuring thorough and well-supported arguments in this matter and potentially lead to meaningful settlement discussions.

5. Plaintiff does not oppose an extension of TransUnion’s time to respond to the Complaint so that the parties may devote their energies to evaluating this matter. TransUnion files

this Motion consistent with its agreement with Plaintiff and further files this Motion respectfully requesting the Court for an extension of time to file its responsive pleading to Plaintiff's Complaint for fourteen (14) days, to May 1, 2025.

6. The Motion is not for delay.

7. This is TransUnion's first extension of time, the requested extension does not prejudice the parties and the extension will not affect any other Court deadlines.

8. For the foregoing reasons, TransUnion requests that the Court issue an order extending the date, to May 1, 2025, on which TransUnion must otherwise respond to Plaintiff's Complaint.

Respectfully submitted,

**BUCHANAN INGERSOLL & ROONEY PC**

By: /s/ Robert J. Murdoch

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Dated: April 15, 2025

*Counsel for Defendant Trans Union, LLC*

**DUTY TO CONFER CERTIFICATION**

Pursuant to the Practices and Procedures of the Honorable Judge Chad F. Kenne, Defendant hereby certifies that he conferred with counsel for Plaintiff in response to this Motion, and that Plaintiff provided his consent to file this Motion.

/s/ Robert J. Murdoch  
Robert J. Murdoch

**CERTIFICATE OF SERVICE**

I hereby certify that on the 15<sup>th</sup> day of April, 2025, I caused a true and correct copy of the foregoing document to be served electronically via the Court's CM/ECF system upon all counsel of record.

/s/ Robert J. Murdoch  
Robert J. Murdoch